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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	Case No. 12-12020 (MG)
	)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	)	Chapter 11
	)	
Debtors.	)	Jointly Administered
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**SUPPELEMENT TO THE RESCAP BORROWER CLAIMS TRUST'S  
COUNTER-DESIGNATION OF ITEMS FOR RECORD ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure and Rule 8007-1 of the Local Bankruptcy Rules for the Southern District of New York, the ResCap Borrower Claims Trust (the “**Borrower Trust**”), established pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors* [Docket No. 6065-1] (the “**Plan**”)\* in the above-captioned Chapter 11 cases (the “**Chapter 11 Cases**”), hereby submits the following supplement to its filed counter-designation of additional items to be included in the record on appeal [Docket No. 7766] (the “**Counter-Designation**”) in connection with the Notice of Appeal [Docket No. 7674] filed by appellants Frank and Christina Reed (the “**Appellants**”), from the *Memorandum Opinion and*

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\* The Plan was confirmed by order of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) dated December 11, 2013 [Docket No. 6065] and the Plan’s effective date occurred on December 17, 2013. The Plan provides for the creation and implementation of the Borrower Trust. *See Plan, (cont'd)*

*Order Determining the Amount of Allowed Claim of Frank and Christina Reed* [Docket No. 7619], which was entered by the Bankruptcy Court on October 6, 2014.

The Borrower Trust includes herewith copies of the Reed Exhibits that were entered into evidence by the Appellant during the September 15-16, 2014 evidentiary hearing, which were previously identified in the Counter-Designation as items to include in the record on appeal.<sup>†</sup>

#### **Exhibits in Evidence from Reed Trial**

<b>Exhibit</b>	<b>Description</b>
<i><b>Reed Exhibits</b></i>	
1	Contract for Sale between Reeds and Jacobs for \$2,040,000, dated December 8, 2007
2	Commerce Bank appraisal of 817 Matlack Drive, Moorestown, NJ 08057
3	Proposal to Purchase by Frank and Gina Roccisano at \$1,300,000 (excluding first two pages of document re: 6/25/2012 letter and bio of Moriuchi)
4	Statement of Scott Alvarez, Federal Reserve testimony before the U.S. Senate
5	Interagency Review of Foreclosure Policies and Practices, Federal Reserve System, Office of the Comptroller of the Currency, Office of Thrift Supervision
6	Lis Pendens recorded against 817 Matlack Drive, Moorestown, NJ 08057
7	Notice of Delinquency from 21 <sup>st</sup> Mortgage Corporation to Reed
8	Order and Opinion Dismissing 2008 Foreclosure Action (GMACM v. Reed)

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*(cont'd from previous page)*

Art. IV.F. The Plan further provides that the Borrower Claims Trustee is deemed the representative of the Debtors' estates for the purpose of prosecuting objections to borrower claims, *see* Plan, Art. IV.S.

<sup>†</sup> For the avoidance of doubt, the Borrower Trust's designation of any pleadings and/or exhibit lists includes the designation of any and all exhibits filed with, attached to, or otherwise referenced in such pleadings. In addition, the Borrower Trust's counter-designation of items for record on appeal does not re-list those items included on the Appellants' designation of items for record on appeal, but incorporates those items by reference to the Statement of Issues and Designation of Record by Appellants Frank Reed and Christina Reed Pursuant to Federal Rule of Bankruptcy Procedure 8006 [Docket No. 7715].

Exhibit	Description
9	Declaration of Lauren Graham Delehey Declaration in Support of ResCap Borrower Claims Trust Objection to Proofs of Claim Filed by Frank Reed and Christina Reed, and attachments thereto, dated May 29, 2014
10	Supplemental Declaration of Lauren Graham Delehey Declaration in Support of ResCap Borrower Claims Trust's Reply in Support of Its Objection to Proofs of Claim, dated July 3, 2014
11	Excerpt from Hearing Transcript, dated July 9, 2014, on Borrower Trust's objection to Reeds' proofs of claim
12	Amended Complaint for Foreclosure, GMACM v. Reed, dated June 3, 2008
13	Statement of Charges for legal services from Law Offices of Jeffrey S. Walters
13A	Declaration of Jeffrey Walters in Support of Statement of Charges
14	Statement of Charges for legal services from Linda Campbell
14A	Declaration of Linda Campbell in Support of Statement of Charges
15	Statement of Charges for legal services from McCrink Law Firm
15A	Declaration of Krisden McCrink in Support of Statement of Charges
17	Testimony of Julie Williams (OCC Testimony before the U.S. Senate)
19	Document addressed to "To Whom It May Concern" from Thomas J. Tartamosa (mortgage broker), dated November 20, 2010

Dated: November 18, 2014  
New York, New York

/s/ Norman S. Rosenbaum

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